

## EXHIBIT – A

SCREEN SHOT OF OFFICIAL GOVERNMENT WEBSITE OF THE CITY OF SEATTLE LISTING PROTECTED CLASSES THE NEW “CASTE” PROTECTED CATEGORY HAS BEEN ADDED HOWEVER, DEFINITION OF CASTE HAS BEEN COPIED VERBATIM FROM THE DEFINITION OF ANCESTRY AND THE CITY OF SEATTLE DID NOT BOTHER TO FIX THE HEADING OF “ANCESTRY” TO “CASTE” THIS DEMONSTRATES THE LEVEL OF UNDERSTANDING THE DEFENDANTS HAVE REGARDING CASTE AND HIGHLIGHTS THE INCOMPETECNY OF THE DEFENDANTS ENTRUSTED WITH ENFORCEMENT OF CASTE DISCRIMINATION. THE CASTE ORDINANCE WAS PASSED ON FEBRUARY 21, 2023, AND THIS SCREENSHOT WAS TAKEN ON MAY 10, 2023, SO OVER TWO MONTHS HAVE PASSED, YET DEFENDANTS HAVE NOT TAKEN THE TROUBLE OF VERIFYING AND CHECKING THE DEFINITON OF CASTE AS A PROTECTED CATEGORY AND CORRECTING IT INSTEAD OF BLINDLY COPYING IT FROM ANCESTRY AND LEAVING IT AS IS AS HAVING THE SAME DEFINITION AS ANCESTRY IF DEFENDANTS THINK CASTE IS SAME AS ANCESTRY, THEN WHAT WAS THE NEED FOR ADDING A NEW PROTECTED CATEGORY OF CASTE? THEY COULD HAVE USED ANCESTRY TO ADDRESS CASTE DISCRIMINATION

**EXHIBIT – A: PROTECTED CATEGORY OF CASTE HAS BEEN BLINDLY COPIED VERBATIM FROM ANCESTRY – SCREENSHOT TAKEN ON MAY 10, 2023**

<https://www.seattle.gov/civilrights/civil-rights-enforcement/protected-classes#ancestry>

The screenshot shows a web browser window for the Seattle Civil Rights website. The URL in the address bar is <https://www.seattle.gov/civilrights/civil-rights-enforcement/protected-classes#ancestry>. The page title is "Ancestry". Below the title, there is a yellow box containing the word "Ancestry". To the right of this box is a red mark with an arrow pointing to it. A large red box encloses the entire content area. Inside this red box, there is a list of behaviors that could be discrimination, preceded by a plus sign (+). The list includes: "Breastfeeding in a Public Place" and "Caste".

PASTED  
TO  
CASTE  
↓

<https://www.seattle.gov/civilrights/civil-rights-enforcement/protected-classes#caste>

The screenshot shows a web browser window for the Seattle Civil Rights website. The URL in the address bar is <https://www.seattle.gov/civilrights/civil-rights-enforcement/protected-classes#caste>. The page title is "Caste". Below the title, there is a yellow box containing the word "Caste". To the left of this box is a red mark with an arrow pointing to it. A large red box encloses the entire content area. Inside this red box, there is a list of behaviors that could be discrimination, preceded by a plus sign (+). The list includes: "Age", "Ancestry", "Breastfeeding in a Public Place", and "Caste".

COPIED  
FROM  
ANCESTRY

↑  
EXACTLY  
SAME  
AS  
ANCESTRY

MAY 10, 2023

The New York Times

**LIVE Just Now**

**Inflation in U.S. Slows Again as High Interest Rates Take Effect**

The Consumer Price Index was up 4.9 percent in April from a year earlier. Price increases peaked just above 9 percent last summer.

See more updates

**Breathlessness in a Public Place**

**Calls**

**Ancestry**

- \* These behaviours, policies, or practices could be discriminatory:
- \* The use of accents or language related to stereotypes or cultural ignorance often used in the form of jokes
- \* A knowing person treating you differently because you have a name or accent associated with a particular ethnic group

**Case**

**Class**

**Take a Trip to One of the Driest Places on Earth...**

A writer drives through Chile's Atacama Desert, where remnants of the dead are preserved. [4 min 41s]

MAY 10, 2023

Washington Examiner

**Wednesday, May 10, 2023**

**News** • **Policy** • **Opinion** • **Watch** • **Restoring America** • **Newsletters** • **SUBSCRIBER CONTENT** • **Sign In** • **Subscribe** • **f** **t** **in**

**LAUREL The you +NURSES**

**GOP REPEA** **DeSantis challenges medical establishment in shaping GOP health policy**

**OPINION** **Olaf Sch Washung speech**

**BREAKING .**

**New details on Biden family 'influence peddling' revealed by GOP**

- Bad day for the Bidens: GOP interim report details alleged 2020 intel plot

By 8 minutes ago

**Breathlessness in a Public Place**

**Calls**

**Ancestry**

- \* These behaviours, policies, or practices could be discriminatory:
- \* The use of accents or language related to stereotypes or cultural ignorance often used in the form of jokes
- \* A knowing person treating you differently because you have a name or accent associated with a particular ethnic group

**Case**

**Class**

**OPINION**

**Is Biden's the most genocide-friendly administration?**

**DEFORIDA BLUEPRINT**

**DeSantis model go national?**

AS OF MAY 10, 2023 9:05 AM EASTERN TIME

## Seattle Office for Civil Rights (civilrights)

# Protected Classes in the City of Seattle

A protected class is a group of people who have a common characteristic and who are legally protected from discrimination based on that characteristic. Protected classes are important because they are legal rights that protect our identities.

The City of Seattle has the following protected classes, where discrimination laws are enforced by the Seattle Office for Civil Rights in employment, housing, contracting, and public places. Below each protected class is an example of what could be considered discrimination. These examples are just a few instances to serve as helpful guidance.

### + Age

#### - Ancestry

→ COPIED AND PASTED  
UNDER "CASTE"

#### Ancestry

These behaviors, policies, or practices could be discrimination:

- The use of accents or language rooted in stereotypes or cultural ignorance, often said in the form of jokes.
- A housing provider treating you differently because you have a name or accent associated with a particular ethnic group.

+ Breastfeeding in a Public Place

+ Caste

COPIED AND PASTED  
FROM ANCESTRY  
WITHOUT ANY  
CHANGES

+ Disability

+ Gender Identity

+ Genetic Information

+ Immigration or Citizenship Status

+ Marital Status

+ National Origin

+ Parental Status

+ Political Ideology

+ Pregnancy Outcome

AS OF MAY 10, 2023 9:05 AM EASTERN TIME

## Seattle Office for Civil Rights (civilrights)

### Protected Classes in the City of Seattle

A protected class is a group of people who have a common characteristic and who are legally protected from discrimination based on that characteristic. Protected classes are important because they are legal rights that protect our identities.

The City of Seattle has the following protected classes, where discrimination laws are enforced by the Seattle Office for Civil Rights in employment, housing, contracting, and public places. Below each protected class is an example of what could be considered discrimination. These examples are just a few instances to serve as helpful guidance.

+ Age

+ Ancestry

+ Breastfeeding in a Public Place

- Caste

COPIED BLINDLY FROM ANCESTRY  
← AND LEFT AS-IS WITHOUT CORRECTION.

These behaviors, policies, or practices could be discrimination:

EVEN THE TITLE SAYS 'ANCESTRY'

5/10/23, 9:05 AM

Protected Classes in the City of Seattle - CivilRights | seattle.gov

- The use of accents or language rooted in stereotypes or cultural ignorance, often said in the form of jokes.
- A housing provider treating you differently because you have a name or accent associated with a particular ethnic group.

AS OF MAY 10, 2023, 9:05 AM EASTERN TIME

**EXACT COPY OF  
THE DEFINITION  
OF ANCESTRY**

## EXHIBIT – B

SEATTLE UNIVERSITY ALUMNI EVENTS  
APRIL 28, 2023, STATE OF THE UNIVERSITY  
ATTENDED ONLINE LIVESTREAM EVENT  
JUNE 2, 2023, PROJECTS DAY  
(IN PERSON POSTER SESSION AND RECEPTION)  
EMAIL INVITATION FOR EVENTS  
TICKET CONFIRMATION FOR EVENTS  
FLIGHT TICKET AND DETAILS  
FOR TRAVEL TO SEATTLE  
ON JUNE 2, 2023, TO ATTEND THE  
IN-PERSON ONLY EVENTS AT  
SULLIVAN HALL, SEATTLE UNIVERSITY  
910 12<sup>TH</sup> AVE, SEATTLE WA 98122  
FRIDAY JUNE 2, 2023, 12 PM – 6 PM (PT)  
12:00 PM CHECK-IN & REGISTRATION  
12:30 PM WELCOME TO PROJECTS DAY  
12:45 PM PRESENTATION SESSION 1  
02:00 PM PRESENTATION SESSION 2  
03:15 PM PRESENTATION SESSION 3  
04:15 PM – 6 PM POSTER SESSION & RECEPTION  
OUT BOUND FLIGHT DETAILS RDU – SEA  
DL 553 JUNE 2, 2023, 7:04 AM – 9:50 AM  
RETURN FLIGHT DETAILS SEA – RDU  
DL 468 JUNE 2, 2023, 9:45 PM – 5:56 AM (JUNE 3, 2023)

**Abhijit, Join Us For the President's State of the University**

Seattle University &lt;uaevents@seattleu.edu&gt;

Mon 3/13/2023 6:32 PM

To: Abhijit Bagal &lt;abhijit\_bagal@hotmail.com&gt;

**Save the Date**

Seattle University President Eduardo  
Peñalver invites you to attend the 2023  
State of the University.

Join fellow alumni, friends, and university leaders in Seattle and around the globe as we explore our reignited vision in service of educating the whole person, strengthening professional formation, and empowering leaders for a more just and humane world. Together we will celebrate our vibrant community and discuss Seattle University's path to becoming one of the most innovative and progressive Jesuit and Catholic universities in the world.

Friday, April 28  
Online via livestream  
5:30 p.m. to 6:30 p.m.

[REGISTER](#)*Details to follow via email*

4/25/23, 10:25 AM

Mail - Abhijit Bagal - Outlook



## Questions?

Please contact Vickielee Wohlbach  
at [vwohlbach@seattleu.edu](mailto:vwohlbach@seattleu.edu).



Seattle University  
901 12th Avenue  
Seattle, WA 98122  
+1 206 220 7443

You are receiving this email as a member of the Seattle U community.

[Preferences](#) | [Unsubscribe](#)

## Order Confirmation for 2023 State of the University

Eventbrite <noreply@order.eventbrite.com>

Fri 4/21/2023 11:31 PM

To: abhijit\_bagal@hotmail.com <abhijit\_bagal@hotmail.com>

**eventbrite**

**Abhijit,  
you've got tickets!**



[Go to My Tickets](#)

**2023 State of the University**



1 x Ticket

Order total: Free

Friday, April 28, 2023 from 5:30 PM to 6:30 PM (PT)

Add to Google · Outlook · iCal · Yahoo

[View event details](#)

Seattle University Advancement

[Follow](#)

Questions about this event?

[Contact the organizer](#)

## Order Summary

Order #6469393519 - April 21, 2023

Free order

Abhijit Bagal

1 x Livestream Admission

\$0.00

[View and manage your order online](#)

Contact the organizer for any questions related to this purchase.

This order is subject to Eventbrite [Terms of Service](#) and [Privacy Policy](#), and [Cookie Policy](#).

## Your tickets

### 1 eTicket

The organizer will follow up with instructions on how to redeem your ticket and access the event.

## Additional Information

The event organizer has provided the following information:

Thank you for registering!

**eventbrite**



This email was sent to [abhijit\\_bagal@hotmail.com](mailto:abhijit_bagal@hotmail.com)

[Eventbrite](#) | 535 Mission Street, 8th Floor | San Francisco, CA 94105

Copyright © 2023 Eventbrite. All rights reserved.

[Privacy Policy](#)

We look forward to seeing you online for S.O.T.U.!

Seattle University <uaevents@seattleu.edu>

Thu 4/27/2023 8:06 PM

To: Abhijit Bagal <abhijit\_bagal@hotmail.com>

No images? [Click here](#)



Thank you for registering for the State of the University. President Peñalver and the Seattle University community are looking forward to connecting and discussing SU's path to becoming one of the most innovative and progressive Jesuit and Catholic universities in the world.

Friday, April 28

Online via Zoom

5:30–6:30 p.m.

[JOIN VIA ZOOM HERE](#)

PASSCODE: 924329

### Meet the Panel Speakers



Thank You for Attending the President's State of the University

Seattle University <uaevents@seattleu.edu>

Fri 5/5/2023 5:04 PM

To: Abhijit Bagal <[abhijit\\_bagal@hotmail.com](mailto:abhijit_bagal@hotmail.com)>

# SEATTLEU



Thank You for Attending S.O.T.U.

On behalf of the Seattle University  
community, thank you for attending  
President Peñalver's State of the University  
address and panel discussion.

For those who were unable to join us, and  
for anyone who wanted to re-watch or  
pass along to a friend, the full recording is  
now available [here](#).



## Tell Us Your Thoughts

We'd love to gauge the response of our  
campus community and hear any feedback

5/5/23, 2:34 PM

Mail - Abhijit Bagal - Outlook

you might have of the event. Please take a few seconds to complete this anonymous, three-question survey.

[TAKE THE SURVEY](#)



Seattle University  
901 12th Avenue  
Seattle, WA 98122  
+1.206.220.8443

You are receiving this email as a member of the Seattle U community.

[Preferences](#) | [Unsubscribe](#)

Abhijit, you are invited to Projects Day 2023

Seattle University Project Center <brownra@seattleu.edu>

Tue 3/28/2023 9:28 PM

To: Abhijit Bagal Bagal <abhijit\_bagal@hotmail.com>

Join us in celebrating our  
students'  
accomplishments!

No images? [Click here](#)



### Register Here

Dear Abhijit,

Please join the Seattle University College of Science & Engineering on June 2nd for Projects Day. Graduating seniors in engineering, environmental science, and computer science as well as master's students in data science will reveal their results of industry-sponsored projects.

This year, Projects Day will be a hybrid event, so be sure to RSVP and indicate how you would like to attend. The students will be doing in-person, live presentations on campus, which will also be live-streamed, followed by an in-person poster session and reception. Please note the poster session and reception will not be live-streamed.

NO  
LIVE  
STREAM

IN  
PERSON  
ONLY

This event is free and open to the public, so come celebrate with us.

[Schedule of Events | Sullivan Hall | June 2, 2023](#)

12:00 PM Check-in and Registration  
(Sullivan Hall West Entrance)  
12:30 PM Welcome to Projects Day  
12:45 PM Presentation Session 1  
2:00 PM Presentation Session 2  
3:15 PM Presentation Session 3  
4:15 PM-6:00 PM Poster Session and Reception

[Share](#)[Tweet](#)[Share](#)[Forward](#)

Seattle University  
College of Science and Engineering  
901 12th Avenue  
Seattle, WA 98122

You are receiving this email because you are connected to Seattle University Science & Engineering and/or Projects Day.

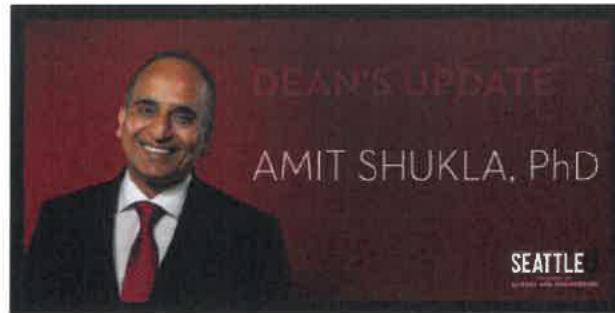
[Preferences](#) | [Unsubscribe](#)

**Dean's Update: SU College of Science and Engineering**

SU College of Science and Engineering &lt;finetm@seattleu.edu&gt;

Wed 3/29/2023 7:01 PM

To: Abhijit and Dhara &lt;abhijit\_bagal@hotmail.com&gt;

**Creativity and Innovation in STEM****Dear Abhijit,**

We are living in an increasingly digital age where science, technology and engineering will have an oversized role in our daily lives. [Seattle University College of Science and Engineering](#) (CSE) is educating future leaders in Science, Technology, Engineering and Mathematics for a just and humane world.

Our faculty, staff and students have been engaged in impactful teaching and learning experiences since the start of the academic year. Our college is adapting and pivoting to embrace this ever-changing world with an emphasis on providing a high quality, personalized education built on a liberal arts foundation. We are doing so by welcoming curricular transformation in existing programs, proposing new degree programs and using data and technology to provide personalized advising and learning.

- Dr. Steve Luckey was awarded our inaugural Rogel Professorship, which is supported by an endowment created by Steve and Connie Rogel, and provides transformative support for our work on enhancing human health and bioengineering. Dr. Luckey's research and scholarship seeks to understand and promote dimensions of human health and well-being where he has utilized both laboratory-based and pedagogical research.
- Dr. Wan Bae was awarded the Thomas Bannan Chair for a two-year term starting July 1, 2023. Dr. Bae's research interests span the areas of spatial and spatiotemporal databases and data mining, GIS, applied computational geometry and health informatics. The overall theme of her research program is to develop computational models and algorithms using an empirical, application-driven approach.

## Students

- First-year student Liliana McClain earned a prestigious scholarship from the American Chemical Society, one of just 300 recipients nationwide and the only Seattle University student to ever receive the honor.

## Alumni

- We hosted a CSE night at Climate Pledge Arena as part of the Men's Basketball game. The event was highly successful in bringing together the community for a night of celebration.

which students will use for a variety of academic activities of their choosing. Thank you to all who contributed! Should you wish to support the college, you may give [here](#).

In the coming months, I expect many innovative and creative projects will be undertaken. I have heard rumors concerning a campus-wide robotic presence and more use of our very popular Billodue Makerspace. I cannot wait to share more information as our students develop innovative and interesting projects to solve societal challenges through science, technology and engineering.

Lastly, we have a record number of students interested in our programs. If you know someone who applied for one of our programs, please encourage them to contact us via [email](#) or visit us on campus for one of the many admitted student events. Seattle University is a unique place where we deeply value student success, while our faculty and staff embrace a teacher-scholar model of education practicing Ignatian pedagogy via a cycle of learning and reflection.

In closing, I invite you to campus for our annual Projects Day on Friday afternoon, June 2 (register [here](#)). Our students will be showcasing their work on industry-sponsored projects. I hope you will join us in celebrating our students and their great efforts.

Respectfully,

Amit Shukla

Amit Shukla, PhD  
Dean



Seattle University  
901 12th Avenue  
Seattle, WA 98122  
+1 206 220 8443

You are receiving this email as a member of the Seattle U community.

[Preferences](#) | [Unsubscribe](#)



Order #6487724289

## Projects Day 2023

### In-Person Projects Day RSVP

Sullivan Hall - Seattle University, 901 12th Ave, Seattle, WA 98122

Friday, June 2, 2023 from 12:00 PM to 6:00 PM (PT)

Free Order



#### Order Information

Order #6487724289. Ordered by Abhijit Bagal on April 24, 2023 8:30 AM

#### Name

Abhijit Bagal



648772428910562452269001

#### Attendee Questions:

#### Type of Attendee (Choose all applicable categories):

Seattle U Alumni

#### Would you like to reserve a complimentary parking pass for Projects Day?

Yes



COLLEGE OF  
SCIENCE AND  
ENGINEERING

Friday, August 7, 2009

To whom it may Concern:

This letter is to acknowledge that Abhijit Bagal received his Master of Software Engineering from Seattle University. As part of our MSE program, Abhijit participated in our required yearlong project sequence as a member of the 1996-97 Microsoft Beta project. This industry-strength project sequence is in lieu of a culminating thesis.

The project sequence is the capstone of the MSE program. Students are organized into teams of three or four in the spring, they prepare during the summer, and each team carries out a software project during the following academic year (fall, winter, and spring quarters). The team is responsible for planning, organizing, and carrying out the work required to complete their project according to the sponsor's timelines. Each project is sponsored a local company. Sponsors have included, Boeing, Microsoft, Cisco, Regence Blue Shield, Nordstrom's, PACCAR, Amazon.com and many others.

Each project has a faculty advisor who reviews and evaluates the work, and a sponsor liaison that serves as customer, participating in requirements specification, design reviews, coordination meetings, and the final acceptance test. A typical project represents approximately one to one and a half person-years effort.

Each project makes a presentation to the faculty, students, sponsors and public at our annual Master of Software Engineering Project Night.

Please do not hesitate to contact me if you require further information.

Regards,

A handwritten signature in black ink that reads "Richard LeBlanc".

Richard LeBlanc, Professor & Chair



Abhijit Bagal &lt;abebagal@gmail.com&gt;

**Your Flight Receipt - ABHIJIT BAGAL 02JUN23**

1 message

Delta Air Lines &lt;DeltaAirLines@t.delta.com&gt;

Tue, Apr 25, 2023 at 11:23 AM

Reply-To: Transactional Email Reply Inbox &lt;reply-295585-14\_HTML-103163538-10982494-486224@t.delta.com&gt;

To: abebagal@gmail.com

[View as a Web Page](#)

#2630301162

SkyMiles® Member

CONFIRMATION #: HP8NMC



You're all set. If your plans change, be sure to make changes or cancel via [MyTrips](#) on [delta.com](#) before your flight departs.

Have a great trip, and thank you for choosing Delta.

### Passenger Info

Name: ABHIJIT BAGAL  
SkyMiles #2630301162

FLIGHT	SEAT
DELTA 553	12A
DELTA 468	14C

Visit [delta.com](#) or download the Fly Delta app to view, select or change your seat. If you purchased a Delta Comfort+™ seat or a Trip Extra, please visit My Trips to access a receipt of your purchase.

Fri, 02JUN	DEPART	ARRIVE
DELTA 553 Delta Comfort+® (W)	RALEIGH-DURHAM, NC 7:04am	SEATTLE 9:50am
DELTA 468 Delta Comfort+® (W)	SEATTLE 9:45pm	RALEIGH-DURHAM, NC 5:56am **Sat 03JUN

\*\*Arrival date is different than departure date.

[MANAGE MY TRIP](#)

### Flight Receipt

Ticket #: 0062103872841  
Place of Issue:  
Issue Date: 25APR23  
Expiration Date: 25APR24

**METHOD OF PAYMENT**

VI\*\*\*\*\*5888

\$1047.80 USD

**CHARGES****Air Transportation Charges**

Base Fare

\$946.98 USD

**Taxes, Fees and Charges**United States - September 11th  
Security Fee(Passenger Civil Aviation  
Security Service Fee) (AY)

\$11.20 USD

United States - Transportation Tax  
(US)

\$71.02 USD

United States - Passenger Facility  
Charge (XF)

\$9.00 USD

United States - Flight Segment Tax  
(ZP)

\$9.60 USD

**TICKET AMOUNT****\$1047.80 USD**



RDU ▶ SEA

Raleigh/Durham, NC to Seattle, WA

FRI, 02 JUN 2023 - FRI, 02 JUN 2023

FLIGHT CONFIRMATION #: **HP8NMC**

ROUND TRIP | 1 PASSENGER



## FLIGHTS

Flight DL 553

FRI, 02 JUN 2023

RDU ▶ SEA

38 DAYS FROM  
DEPARTURE

ON TIME

DEPART: 7:04 AM\*

ARRIVE: 9:50 AM

SEAT: 12A

Find Sky Club Locations:  
Raleigh-Durham Intl - RDU  
Seattle-Tacoma Intl - SEA

Airport Map: RDU | SEA

Aircraft: Boeing 737-800

Flight Time: 5hr 46m

On Time % : N/A

Miles Flown: 2,347

DELTA COMFORT+® (W)

In-Flight services and amenities  
may vary and are subject to change.

PASSENGER STATUS: CONFIRMED

Flight DL 468

FRI, 02 JUN 2023

SEA ▶ RDU

38 DAYS FROM  
DEPARTURE

ON TIME

DEPART: 9:45 PM\*

ARRIVE: 5:56 AM -  
SAT, 03 JUN

SEAT: 14C

Find Sky Club Locations:  
Seattle-Tacoma Intl - SEA  
Raleigh-Durham Intl - RDU

Airport Map: SEA | RDU

Aircraft: Boeing 737-800

Flight Time: 5hr 11m

On Time % : N/A

Miles Flown: 2,355

DELTA COMFORT+® (W)

In-Flight services and amenities  
may vary and are subject to change.

PASSENGER STATUS: CONFIRMED

## PASSENGER INFORMATION

4/25/23, 11:22 AM

[Print My Trips](#)

	NAME	FLIGHT	SEATS	SPECIAL SERVICE REQUESTS
1	ABHIJIT BAGAL SkyMiles # 2630301162 eTicket #0062103872841	RDU ► SEA	12A Delta Comfort+® (W)	
		SEA ► RDU	14C Delta Comfort+® (W)	

**Complete Delta Air Lines Baggage Information**

Baggage fees will be assessed at the time you check in.

Final baggage fees will be assessed and charged at time of check-in. Baggage fees may change based on the class of service or frequent flyer status.

All prices are (USD) unless otherwise noted. If your itinerary qualifies for Trip Insurance, you will be able to add it before you purchase your ticket.

[View Change & Cancellation Policies](#)



Date of Purchase: Apr 25, 2023

Raleigh/Durham, NC ► Seattle, WA

## Passenger Information

ABHIJIT BAGAL  
SkyMiles#: 2630301162

Confirmation Number: HP8NMC  
Ticket Number: 0062103872841

## FLIGHT

Date and Flight  
RDU ► SEA | Fri 02Jun2023 | DL 553 |  
SEA ► RDU | Fri 02Jun2023 | DL 468 |

Status	Class	Seat/Cabin
OPEN	W	12A
OPEN	W	14C

## DETAILED CHARGES

## Air Transportation Charges

Base Fare: \$946.98 USD

## Taxes, Fees and Charges

United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY)	\$11.20 USD
United States - Transportation Tax (US)	\$71.02 USD
United States - Passenger Facility Charge (XF)	\$9.00 USD
United States - Flight Segment Tax (ZP)	\$9.60 USD
<b>Total Price:</b>	<b>\$1,047.80 USD</b>

Paid with Visa ending 5888

\$1,047.80 USD

## KEY OF TERMS

# - Arrival date different than departure date  
\*\* - Check-in required  
\*\*\* - Multiple meals  
\*\$S\$ - Multiple seats  
AR - Arrives  
B - Breakfast  
C - Bagels / Beverages  
D - Dinner

F - Food available for purchase  
L - Lunch  
LV - Departs  
M - Movie  
R - Refreshments, complimentary  
S - Snack  
T - Cold meal  
V - Snacks for sale

Check your flight information online at delta.com or call the Delta Flightline at 800.325.1999.

Baggage and check-in requirements vary by airport and airline, so please check with the operating carrier on your ticket.

Please review Delta's [check-in requirements](#) and [baggage](#) guidelines for details.

You must be checked in and at the gate at least 15 minutes before your scheduled departure time for travel inside the United States.

You must be checked in and at the gate at least 45 minutes before your scheduled departure time for international travel.

For tips on flying safely with laptops, cell phones, and other battery-powered devices, please visit <http://SafeTravel.dot.gov>

Do you have comments about service? Please [email](#) us to share them.

## NON-REFUNDABLE / CHANGE FEE

When using certain vouchers to purchase tickets, remaining credits may not be refunded. Additional charges and/or credits may apply and are displayed in the sections below.

This ticket is non-refundable unless issued as a fully refundable fare. Any change to your itinerary may require payment of a change fee and increased fare. If you do not show up for any flight in your itinerary without notifying Delta or canceling/changing your flight prior to departure, Delta may cancel the reservation for all remaining flights in the itinerary, and the ticket will have no remaining value.

All Preferred, Delta Comfort+, First Class, Delta Premium Select, and Delta One seat purchases are non-refundable.

## **EXHIBIT – C**

COMPLAINT TO USDOJ CIVIL RIGHTS DIVISION  
RESPONSE FROM USDOJ CIVIL RIGHTS DIVISION  
CITY OF SEATTLE CLAIM FOR DAMAGES FORM  
STANDARD TORT CLAIM FORM  
(GENERAL LIABILITY CLAIM FORM #SF 210)  
PURSUANT TO CHAPTER 4.92 RCW, THIS FORM  
IS FOR FILING A TORT CLAIM AGAINST THE  
STATE OF WASHINGTON  
LAST PAGE OF SIGNED LETTER  
SENT WITH FORMS TO  
SEATTLE CITY CLERK'S OFFICE  
USPS PRIORITY MAIL TRACKING NUMBER  
ACKNOWLEDGEMENT FROM CITY OF SEATTLE  
DATED MARCH 10, 2023



**United States Department of Justice  
Civil Rights Division**  
[civilrights.justice.gov](http://civilrights.justice.gov)

Thank you for submitting a report to the Civil Rights Division.

**Report successfully submitted**



Your record number is: **264639-FJX**

---

## **What to expect**

---

**① We review your report**

Our specialists in the Civil Rights Division carefully read every report to identify civil rights violations, spot trends, and determine if we have authority to help with your report.

**② Our specialists determine the next step**

We may decide to:

**Open an investigation** or take some other action within the legal authority of the Justice Department.

**Collect more information** before we can look into your report.

**Recommend another government agency** that can properly look into your report. If so, we'll let you know.

In some cases, we may determine that we don't have legal authority to handle your report and will recommend that you seek help from a private lawyer or local legal aid organization.

**③ When possible, we will follow up with you**

We do our best to let you know about the outcome of our review. However, we may not always be able to provide you with updates because:

**We're actively working on an investigation or case related to your report.**

**We're receiving and actively reviewing many requests at the same time.**

If we are able to respond, we will contact you using the contact information you provided in this report.

Depending on the type of report, response times can vary. If you need to reach us about your report, please refer to your report number when contacting us. This is how we keep track of your submission.

---

## **What you can do next**

---

## ① Contact local legal aid organizations or a lawyer if you haven't already

Legal aid offices or members of lawyer associations in your state may be able to help you with your issue.

American Bar Association, visit [www.americanbar.org/groups/legal\\_services/flh-home](http://www.americanbar.org/groups/legal_services/flh-home) or call (800) 285-2221

Legal Services Corporation (or Legal Aid Offices), to help you find a legal aid lawyer in your area visit [www.lsc.gov/find-legal-aid](http://www.lsc.gov/find-legal-aid) or call (202) 295-1500

## ② Get help immediately if you are in danger

If you reported an incident where you or someone else has experienced or is still experiencing physical harm or violence, or are in immediate danger, please call 911 and contact the police.

---

# Your submission

---

## Contact

### Contact information

#### Your name

Abhijit Bagal

#### Email address

abebagal@gmail.com

#### Phone number

9199173839

#### Address

125 Vista Brooke Drive

-  
Morrisville, North Carolina 27560

### Are you now or have ever been an active duty service member?

No

---

## Primary concern

### What is your primary reason for contacting the Civil Rights Division?

Something else happened

---

## Location

<https://civilrights.justice.gov/report/>

**Where did this happen?****Organization name**

Seattle City Council

**Address**

600 Fourth Avenue  
2nd Floor  
Seattle, Washington

---

**Personal characteristics****Do you believe any of these personal characteristics influenced why you were treated this way?**

Religion

Race/color

National origin (including ancestry and ethnicity)

**Date****When did this happen?**

2/21/2023

**Personal description****In your own words, describe what happened**

I am writing this complaint to you as a concerned Hindu American citizen and a first-generation immigrant of Indian/South Asian descent. I have a personal connection to Seattle as I was a graduate student at Seattle University pursuing my master's degree. I am filing this complaint against the following individuals in their official capacities as members of the Seattle City Council in Seattle, State of Washington.

1. Lisa Herbold, District 1
2. Tammy J. Morales, District 2
3. Kshama Sawant, District 3
4. Alex Pedersen, District 4
5. Debora Juarez, District 5
6. Dan Strauss, District 6
7. Andrew J. Lewis, District 7
8. Teresa Mosqueda, Position 8

On February 21st, 2023, at 2 PM, the Seattle City Council had a meeting in which they passed an alarming, racist law that expands existing anti-discrimination statutes to include "caste" as a specific category of prejudice. Introduced by District 3 Councilmember Kshama Sawant, the Seattle City Council passed the caste discrimination ordinance in a 6-1 vote. Councilmember Sara Nelson (Position 9) who cast the lone dissenting vote agreed with opponents calling the ordinance "a reckless, harmful solution to a problem for which we have no data or research."

This is in direct violation of the First and Fourteenth Amendments to the U.S. Constitution. This new "caste" law also violates 42 U.S.C. Section 1983, Due Process, and Equal Protection rights of Hindu Americans.

As a Hindu American citizen and a first-generation immigrant of Indian/South Asian descent, I am filing this complaint to prevent the Seattle City Council and the Seattle Office for Civil Rights from enforcing the "caste" law and to safeguard my constitutional rights, as well as the rights of other Hindu Americans and South Asians who are similarly situated. This "caste" law is unconstitutionally vague and violates my rights

3/6/23, 8:21 AM

Submission complete

(and similarly situated individuals) under the First and Fourteenth Amendments to the United States Constitution.

The harm at issue here is significant. As the Supreme Court has repeatedly held, the “loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” Elrod v. Burns, 427 U.S. 347, 373 (1976).

I respectfully request that your office:

1. Declares that the Seattle City Council, through the actions described above, has violated the First and Fourteenth Amendments, Due Process, and Equal Protection rights of Hindu Americans.
2. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from engaging in any act or practice that seeks to define Hinduism as including a caste system or any other belief or practice.
3. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from bringing any religious discrimination action based on the premise that Hindu belief and practice include a caste system.
4. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from ascribing religious or moral beliefs or practices to persons or groups who expressly disclaim any such beliefs or practices.
5. Grants such other additional further relief as your office deems just and proper.



Abhijit Bagal &lt;abebagal@gmail.com&gt;

## Response: Your Civil Rights Division Report - 264639-FJX from the Administrative Section

1 message

**DOJ Civil Rights - Do Not Reply** <civilrightsdonotreply@mail.civilrights.usdoj.gov>Tue, Mar 7, 2023 at 4:38  
PM

Reply-To: civilrightsdonotreply@mail.civilrights.usdoj.gov

To: abebagal@gmail.com

Dear Abhijit Bagal,

You contacted the Department of Justice on March 6, 2023. After careful review of what you submitted, we have decided not to take any further action on your complaint.

What we did:

Team members from the Civil Rights Division reviewed the information you submitted. Based on this information, our team determined that the federal civil rights laws we enforce do not cover the situation you described. Therefore, we cannot take further action.

Your report number is 264639-FJX.

What you can do:

Your issue may be covered by other federal, state, or local laws that we do not have the authority to enforce. We are not determining that your report lacks merit.

Your state bar association or local legal aid office may be able to help with your issue even though the Department of Justice cannot.

To find a local office:

American Bar Association

[www.americanbar.org/groups/legal\\_services/flh-home](http://www.americanbar.org/groups/legal_services/flh-home)

(800) 285-2221

Legal Services Corporation (or Legal Aid Offices)

[www.lsc.gov/find-legal-aid](http://www.lsc.gov/find-legal-aid)

(202) 295-1500

Thank you for taking the time to contact the Department of Justice about your concerns. We regret that we are not able to provide more help on this matter.

Sincerely,

U.S. Department of Justice

Civil Rights Division



**CITY OF SEATTLE  
CLAIM FOR DAMAGES**

Note:  
**Type or Print Legibly.**  
See Instructions on back.

<b>CITY USE ONLY</b>	
CLAIM NUMBER	
DATE FILED	

<b>CLAIMANT</b>	NAME (FIRST - MIDDLE - LAST, OR BUSINESS NAME) <b>ABHIJIT BAGAL</b>	DATE OF BIRTH [REDACTED]	HOME PHONE <b>919-917-3839</b>
CURRENT HOME ADDRESS (NUMBER - STREET - CITY - STATE - ZIP) <b>125 VISTA BROOK DR. MORRISVILLE NC 27560</b>		BUS. PHONE	
HOME ADDRESS AT THE TIME THE CLAIM AROSE (NUMBER - STREET - CITY - STATE - ZIP)		CELL PHONE [REDACTED]	E-MAIL ADDRESS <b>ABEBAGALE@GMAIL.COM</b>
<b>ACCIDENT/LOSS</b>	DATE <b>02/21/2023</b>	TIME <b>2 PM</b>	DIAGRAM Use if this will help you locate or describe what happened
<b>LOCATION/SITE</b>	BE VERY SPECIFIC: STREETS, ADDRESSES, etc. <b>SEATTLE CITY COUNCIL 600 FOURTH AVE. 2nd FLOOR, SEATTLE, WA</b>		
<b>WHAT HAPPENED?</b>	DESCRIBE IN YOUR OWN WORDS HOW THIS LOSS OCCURRED AND WHY YOU BELIEVE THE CITY IS RESPONSIBLE. (additional space on reverse side or attach additional pages and supportive documents as needed)		
<p>ON 02/21/2023 at 2 PM, Seattle city council had a meeting at which they passed a "Castile" law that violates my rights.</p>			
NAMES, ADDRESSES, AND PHONE NUMBERS OF ALL PERSONS INVOLVED IN OR WITNESS TO THIS INCIDENT			
<p>*<sup>1)</sup> FOLLOWING 8 INDIVIDUALS IN THEIR OFFICIAL CAPACITIES OF SEATTLE CITY COUNCIL</p> <p><sup>2)</sup> LISA HERBOLD <sup>3)</sup> TAMMY J. MORALES</p> <p>Ph: <sup>③</sup> KSHAMA SAWANT Ph: _____</p>			
CITY DEPT?			
CITY EMPLOYEE			
CITY VEHICLE NUMBER, LICENSE, etc.			
<b>WAS YOUR PROPERTY DAMAGED?</b> (i.e. Home, Auto, Personal Property)			
<input type="checkbox"/> YES IF SO, THEN FULLY DESCRIBE - SUCH AS AGE, MAKE, MODEL, CONDITION, VALUE, OR EXTENT OF DAMAGE <input checked="" type="checkbox"/> NO (additional space on reverse side or attach additional pages and supportive documents as needed)			
<b>WERE YOU INJURED?</b> <input checked="" type="checkbox"/> YES IF YES, THEN COMPLETE THE FOLLOWING: <input type="checkbox"/> NO (additional space on reverse side or attach additional pages and supportive documents as needed)			
DESCRIBE YOUR INJURY (IDENTIFY YOUR DOCTOR(S)) <b>MENTAL ANGUISH, EMOTIONAL PAIN,</b> <b>SUFFERING, INCONVENIENCE, HUMILIATION, LOSS OF ENJOYMENT OF LIFE</b>			
WAGE LOSS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, THEN RATE OF PAY: _____			
KIND OF WORK	<b>N/A</b>	EMPLOYER	<b>N/A</b>
<b>AMOUNT CLAIMED</b> (if known)	\$ <b>PROVIDE COMPENSATION FOR LOSSES DUE TO EMOTIONAL PAIN</b>		
<b>SIGNATURE OF CLAIMANT</b> (AND TITLE, IF A BUSINESS)			
I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct			
This claim form must be signed by the Claimant, verifying the claim; or pursuant to a written power of attorney, by the attorney in fact for the claimant; or by an attorney admitted to practice in Washington State on the claimant's behalf; or by a court-approved guardian or guardian ad litem on behalf of the claimant.			
EXECUTED this <b>6<sup>TH</sup></b> day of <b>MARCH, 2023</b> At <b>125 Vista Brooke Dr.</b> <b>County, Washington</b> <b>MORRISVILLE, NC 27560</b>			

\*<sup>④</sup> ALEX PEDERSEN <sup>⑤</sup> DEBORAH JUAREZ <sup>⑥</sup> DAN STRAUSS  
<sup>⑦</sup> ANDREW J. LEWIS <sup>⑧</sup> TERESA MOSQUEDA

## PRESENTATION OF A CLAIM

This official City of Seattle document must be signed, and the form with original signature (not a photocopy or scanned copy) must be mailed *or* delivered.

**Mail to:**

CITY CLERK'S OFFICE  
PO BOX 94728  
Seattle, WA 98124-4728

**Deliver to:**

CITY HALL  
600 Fourth Ave., 3<sup>rd</sup> floor  
Between James St & Cherry St  
Business Hours: Monday-Friday, 8:00 a.m.-5:00 p.m.  
Closed on weekends and official City of Seattle holidays

An adjuster will be assigned to your claim after it is filed with the City Clerk's Office. It is to your advantage to present with your claim relevant supporting documents (receipts, cancelled checks, estimates, billings, etc.) or additional evidence (photos, diagrams, etc.). Please note that the claim form and other supporting documents filed with the City Clerk are considered public records under Revised Code of Washington Chapter 42.56, the Public Records Act. Public records are presumed subject to disclosure upon request. Additional claim forms can be downloaded from the Risk Management website: (<http://www.seattle.gov/riskmanagement/>)

## EXPLANATION OF THE CLAIMS PROCESS

Shortly after your claim is filed in the City Clerk's Office, it is delivered to the Claims Section. The claim is then assigned to an adjuster who will contact you with your assigned claim number and their contact information and then they will conduct an investigation which includes a written response from the involved department(s). The Claims Section will then evaluate and recommend a reasonable resolution of your claim which will be one of three alternatives:

1. Pay a sum of money.
2. Tender – transfer to another party or entity responsible for your alleged damages.
3. Deny – where there is no evidence of any negligence by the City of Seattle.

If you have any questions about filing then do not hesitate to call 684-8213 during normal business hours Monday-Friday, 8:00 a.m.-5:00 p.m. If you have any questions after filing, call the Claims Adjuster assigned to your claim.

CS 19.10 REV. 12/14

## THIS SPACE PROVIDED FOR ADDITIONAL INFORMATION

Also attached are the following :

(1) Standard Tort claim Form

(2) Letter with details of how the "Castor" law passed by Seattle City Council on 02/21/2023 at 2 PM is Unconstitutional and violates my civil rights.

(3) Copy of Report that I have filed to the United States Department of Justice, Civil Rights Division on 03/06/2023, RECORD # 264639-FJX

**STANDARD TORT CLAIM FORM**

General Liability Claim Form #SF 210

For Official Use Only

Pursuant to Chapter 4.92 RCW, this form is for filing a tort claim against the state of Washington. Some of the information requested on this form is required by RCW 4.92.100 and may be subject to public disclosure. Pursuant to the law, Standard Tort Claim forms cannot be submitted electronically (via email or fax).

**PLEASE TYPE OR PRINT CLEARLY IN INK**

<b>Mail to:</b>	<b>Deliver to:</b>
City Clerk's Office P.O. Box 94728 Seattle, WA 98124-4728	City Hall 600 Fourth Avenue, 3 <sup>rd</sup> Floor Between James St. and Cherry St.

Business Hours: Monday – Friday 8:00 a.m. – 5:00 p.m.  
Closed on weekends and official City of Seattle holidays.

1. Claimant's name:	<u>BAGAL ABHIJIT</u>	[REDACTED]	
Last name	First	Middle	Date of birth (mm/dd/yyyy)
2. Inmate DOC number (if applicable):	<u>N/A</u>		
3. Current residential address:	<u>125 VISTA BROOKE DR. MORRISVILLE, NC</u>		
4. Mailing address (if different):	<u>N/A</u>		
5. Residential address at the time of the incident: (if different from current address)	<u>N/A</u>		
6. Claimant's daytime telephone number:	<u>919-917-3839</u>		
Home	Business or Cell		
7. Claimant's e-mail address:	<u>ABEBAGALE@GMAIL.COM</u>		
8. Date of the incident:	<u>02/21/2023</u>	Time: <u>2</u> <input type="checkbox"/>	a.m. <input checked="" type="checkbox"/> p.m. (check one)
	(mm/dd/yyyy)		
9. If the incident occurred over a period of time, date of first and last occurrences:			
from	<u>02/21/2023</u>	Time: <u>2</u> <input type="checkbox"/>	a.m. <input type="checkbox"/> p.m.
	(mm/dd/yyyy)		
to	<u>02/21/2023</u>	Time: <u>2</u> <input type="checkbox"/>	a.m. <input type="checkbox"/> p.m.
	(mm/dd/yyyy)		
10. Location of incident:	<u>WA, KING</u>	<u>SEATTLE</u>	<u>SEATTLE CITY COUNCIL</u>
	State and county	City, if applicable	Place where occurred

(1)

11. If the incident occurred on a street or highway:

Name of street or highway	Milepost number	At the intersection with or nearest intersecting street
---------------------------	-----------------	---

12. State agency or department alleged responsible for damage/injury:

SEATTLE CITY COUNCIL

13. Names, addresses and telephone numbers of all persons involved in or witness to this incident:

FOLLOWING INDIVIDUALS IN THEIR OFFICIAL CAPACITIES AS MEMBERS OF THE SEATTLE CITY COUNCIL:  
 (1) LISA HERBOLD (2) TAMMY J. MORALES (3) KSHAMA SALWANT  
 (4) ALEX PEDERSEN (5) DEBORAH JUAREZ (6) DAN STRAUSS

14. Names, addresses and telephone numbers of all state employees having knowledge about this incident:

(7) ANDREW J. LEWIS (8) TERESA MOSQUEDA

15. Names, addresses and telephone numbers of all individuals not already identified in #13 and #14 above that have knowledge regarding the liability issues involved in this incident, or knowledge of the Claimant's resulting damages. Please include a brief description as to the nature and extent of each person's knowledge. Attach additional sheets if necessary.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

16. Describe the cause of the injury or damages. Explain the extent of property loss or medical, physical or mental injuries. Attach additional sheets if necessary.

VIOLATION OF FIRST AND FOURTEENTH AMENDMENT  
VIOLATION OF DUE PROCESS  
VIOLATION OF EQUAL PROTECTION RIGHTS  
DISCRIMINATION BASED ON MY RELIGION  
DISCRIMINATION BASED ON MY ANCESTRY  
DISCRIMINATION BASED ON MY NATIONAL ORIGIN  
MENTAL ANGUISH CAUSED BY FALSE ACCUSATIONS  
OF CASTE THAT HURTS MY RELIGIOUS BELIEFS  
AND RESTRICTS MY RIGHTS TO PRACTICE RELIGIOUS  
PLEASE SEE ATTACHED LETTER FOR MORE DETAILS.

(3)

17. Has this incident been reported to law enforcement, safety or security personnel? If so, when and to whom? Please attach a copy of the report or contact information.

RECORD # 264639- FJX

YES, I HAVE REPORTED THIS TO THE DEPARTMENT OF JUSTICE, CIVIL RIGHTS DEPARTMENT, ON 03/06/2023

18. Names, addresses and telephone numbers of treating medical providers. Attach copies of all medical reports and billings.

---

---

---

---

---

19. Please attach documents which support the allegations of the claim. → ATTACHED .

20. I claim damages from the state of Washington in the sum of \$ X  
\* PROVIDE COMPENSATION FOR LOSSES SUCH AS EMOTIONAL PAIN,  
SUFFERING, INCONVENIENCE, HUMILIATION, LOSS OF ENJOYMENT  
This Claim form must be signed by the Claimant, a person holding a written power of attorney from the OF LIFE  
Claimant, by the attorney in fact for the Claimant, by an attorney admitted to practice in Washington State  
on the Claimant's behalf, or by a court-approved guardian or guardian ad litem on behalf of the Claimant.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

ABHIJIT BAGAL

03/06/2023

125 VISTA BROOK DR.  
MORRISVILLE, NC 27560

Signature of Claimant

Date and place (residential address, city and county)

Or

Signature of Representative

Date and place (residential address, city and county)

Print Name of Representative

Bar Number (if applicable)

origin is inherently suspect." *Fisher v. Univ. of Tex.*, 570 U.S. 297, 310 (2013) (quoting *Fullilove v. Klutznick*, 448 U.S. 448, 523 (1980) (Stewart, J., dissenting) (internal quotation marks omitted)). That is the case "even for so-called 'benign' racial classifications . . ." *Johnson v. Calif.*, 543 U.S. 499, 505 (2005) (citations omitted). As a result, this "caste" law violates the Equal Protection Clause of the Fourteenth Amendment.

Further, the Seattle "caste" law does not define "caste" clearly. "Caste" is not a term understood by people of ordinary intelligence; indeed, most Hindu Americans/South Asians who will be governed by the "caste" law are unfamiliar with the term or its meaning or contexts. Therefore, the Seattle "caste" law is unconstitutionally vague in violation of the Due Process Clause of the Fourteenth Amendment.

White American citizens of European descent have been declared to be outside the scope of Seattle City Council's "caste" law as the ordinance specifically targets people of color based on their national origin, ancestry, and religion such as Hindus from South Asia. This is both ironic (since "caste" came from the word "casta" which means "lineage" in Spanish and Portuguese) and Unconstitutional.

As a Hindu American citizen and a first-generation immigrant of Indian/South Asian descent, I am filing this complaint to prevent the Seattle City Council and the Seattle Office for Civil Rights from enforcing the "caste" law and to safeguard my constitutional rights, as well as the rights of other Hindu Americans and South Asians who are similarly situated. This "caste" law is unconstitutionally vague and violates my rights (and similarly situated individuals) under the First and Fourteenth Amendments to the United States Constitution. The harm at issue here is significant. As the Supreme Court has repeatedly held, the "loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

I respectfully request that your office:

1. Declares that the Seattle City Council, through the actions described above, has violated the First Amendment, Due Process, and Equal Protection rights of Hindu Americans.
2. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from engaging in any act or practice that seeks to define Hinduism as including a caste system or any other belief or practice.
3. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from bringing any religious discrimination action based on the premise that Hindu belief and practice include a caste system.
4. Enjoins the Seattle City Council and the Seattle Office for Civil Rights from ascribing religious or moral beliefs or practices to persons or groups who expressly disclaim any such beliefs or practices.
5. Grants such other additional further relief as your office deems just and proper.

Sincerely,



Abhijit Bagal

Dated: March 06, 2023

125 Vista Brooke Drive, Morrisville, NC 27560 Email: [abebagal@gmail.com](mailto:abebagal@gmail.com) Phone: 919.917.3839

Credit Card Remit \$9.65

Card Name: VISA  
Account #: XXXXXXXXX8172  
Approval #: 006879  
Transaction #: 601  
AID: A0000000031010  
AL: VISA CREDIT  
PIN: Not Required

---

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com](http://www.usps.com) USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Preview your Mail  
Track your Packages



---

March 10, 2023

Abhijit Bagel  
125 Vista Brooke Dr  
Morrisville, North Carolina  
27560

RE: City of Seattle Claim for Damages: 23-0540

Abhijit Bagel:

We are in receipt of your claim as referenced above. This claim has been shared with the City Attorney's Office. We do not guarantee any decisions will be made at the claims stage and you should act to protect your rights.

Sincerely,

***Sent Without Signature to Avoid Delay***

Joel Lambert  
Claims Manager  
Risk Management Division

## EXHIBIT – D

DETAILS AND TIMELINE OF THE CISCO CASE  
FROM THE “*CASTE/GATE/FILES*” REPOSITORY:  
“*CASTE/GATE/FILES*” IS A FACT-BASED, GRASSROOTS,  
CROWD-SOURCED, WHISTLEBLOWER PLATFORM OF  
NON-PARTISAN, INDEPENDENT AMERICAN VOLUNTEERS  
POLITICALLY AGNOSTIC AND ISSUE BASED  
PLAINTIFF IS A VOLUNTEER FOR “*CASTE/GATE/FILES*”

“*CASTE/GATE/FILES*” RULES OF ENGAGEMENT:  
PUBLISH PUBLICLY AVAILABLE DATA ONLY  
OBJECTIVE DETAILED VERIFIABLE ALLEGATIONS  
NOT BASED ON ANY SPECULATION OR RUMORS  
NO ABUSIVE LANGUAGE OR PERSONAL ATTACKS  
VOICE OF THE SUBALTERN VIEWPOINT  
CHALLENGE FALSE/FAKE NARRATIVES  
PROVIDE EVIDENCE BASED INFORMATION  
CHALLENGE UNCONSTITUTIONAL ACTS  
DEBUNK DEMEANING STEREOTYPES  
ENSURE EQUAL PROTECTION OF THE LAW  
SUSTAIN INDIVIDUAL LIBERTY OF ALL AMERICANS  
PREVENT GOVERNMENT OVERREACH AND ABUSE  
RESTORE SEPARATION OF POWERS – CHECKS & BALANCES  
PROMOTE DIGNITY, MUTUAL RESPECT, PLURALISM  
ACTIVE PARTICIPATION IN LOCAL COMMUNITIES

### Key Facts of the Cisco caste case

There is only one legal case on the issue of caste-discrimination in the United States to date. It involves an allegation of caste-based discrimination in the state of California at Cisco.

On April 10, 2023 the California Civil Rights Department voluntarily dismissed with Prejudice its case in Superior Court against Cisco Systems engineers Sundar Iyer and Ramana Kompella, who faced allegations of caste based discrimination. There has been no ruling yet on whether any form of caste-based discrimination or harassment had in fact occurred.

The State of California's Department of Fair Employment and Housing sued Cisco Systems in June 2020, accusing the company of engaging in unlawful employment practices over a claim by an Indian-origin employee (John Doe) that two managers, also of Indian origin, allegedly discriminated against him on the basis of his assumed caste. The case was initially filed in federal court, but has since been re-filed in state court. Cisco Systems is promising a rigorous defense, rejecting the claim of discrimination.

After a case conference in December 2022, it appeared from filings that the state would consider dismissing its case against the two named defendants if they did not file a Motion for Sanctions. On January 23, 2023, defendants proceeded to file a [Motion for Sanctions](#) alleging prosecutorial abuse, *suppressing key evidence and fabricating evidence*.

Below are some excerpts from the motion:

1. Iyer has remained publicly irreligious for over 20 years, yet the CRD assigns him a religion and caste.
2. Iyer's extended family consists of at least two relatives who self-identify as Dalit.
3. Iyer has known Doe, who self-identifies as Dalit, since they attended the Indian Institute of Technology together, more than 20 years ago. Based in part upon that long-standing relationship, Iyer recruited and hired Doe to join him at Cisco to work on a high-profile project.
4. Far from being the "untouchable" victim described in the lawsuit, Doe earned several millions of dollars working for Cisco with Iyer and Kompella as Principal Engineer. To incentivize his team, Iyer **gave away millions of dollars**, the **entirety** of his own equity as CEO of the high-profile project, to employees including Doe. Doe was among the highest compensated employees in the group. Yet Plaintiff, on behalf of Doe, alleges that Doe was denied compensation increases which amounted to only a few thousand dollars.
5. The high-profile Cisco project that Plaintiff claims as "entirely Indian" in which Doe was "lone Dalit," and had a "hostile-to-Dalit" environment, was staffed with several non-Indian employees and at least one other self-identifying Dalit.
6. **Iyer hired, mentored, and championed another self-identified Dalit, and subsequently offered that individual the role leading the high-profile project.** To this day, and upon information and belief, CRD has not interviewed this person.

7. During Doe' tenure, all three leadership positions in the high-profile project were first offered to (or accepted by) a candidate that self-identified as Dalit, and two such offers (including the Head of Engineering position) were made prior to any purported complaints of caste discrimination.
8. Kompella was unaware of Doe's caste at the time he allegedly harassed Doe.

The timeline below highlights key facts from court filings and other publicly available information, which have been overlooked by most of the media coverage surrounding the case.

### Court Filings

April 10, 2023

- CRD's Voluntary Dismissal with Prejudice

March 2023

- Defendant's Withdrawal of Motion for Sanctions

January 11, 2023

- [Defendants' Notice of Motion and Motion for Sanctions](#)
- [Memorandum of Law Supporting Motion for Sanctions](#)

December 30, 2022

- [Case Management Filing](#)

November 3, 2021

- [Demurrer \(Motion to Dismiss\)](#)
- [Liburtin Declaration](#)

February 11, 2021

- [Court Order Denying DFEH's Motion to Proceed Using Fictitious Name](#)

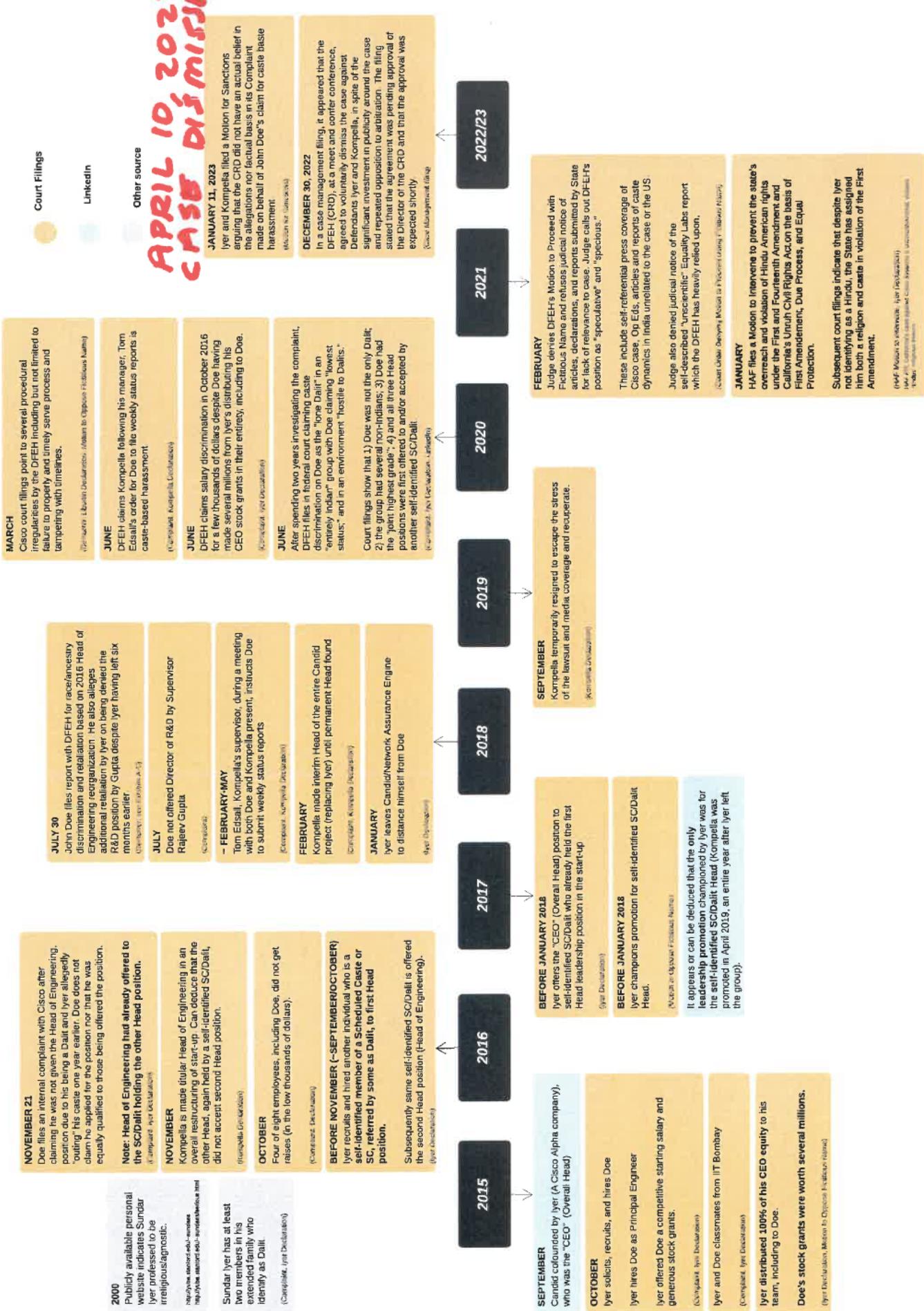
January 26, 2021

- Motions to Oppose Fictitious Name
  - [Defendants Iyer and Kompella Motion to Oppose Fictitious Name](#)
  - [Cisco's Motion to Oppose Fictitious Name](#)
  - [Iyer Declaration](#)
  - [Kompella Declaration](#)

January 7, 2021

- [HAF's Motion to Intervene](#)
- [DFEH Complaint](#)

Court filings also available at [Public Portal - Superior Court of California, County of Santa Clara](#) (search term 'Kompella')



# Caste Gate

[Home](#) > [Knowledge Base](#) > [The Publicly Known Timeline Of The Cisco Caste Discrimination Case](#)

## The Public Timeline Of The Cisco Caste Discrimination Case

### The bizarre facts that point to the California Civil Rights Department's (CRD, previously DFEH) corruption

Sr. No.	DATE	SEVERITY	EVENT	SOURCE
1	Sep 2015		The co-defendant Mr. Iyer incubates an internal startup at CISCO. Mr. Iyer is the Co-founder, overall Head, and CEO of the startup.	Mr. Iyer's LinkedIn, Mr. Iyer's Bio.
2	Oct 2015 (a)		Mr. Kompella the co-defendant along with several others are hired by Mr. Iyer as 'Principal Engineers.'	Mr. Kompella's LinkedIn.
3	Oct 2015 (b)	Same Actor Inference	John Doe is personally solicited (in part due to his long-standing relationship with Doe as a batchmate at the Indian Institute of Technology) and hired as a 'Principal Engineer' by Mr. Iyer despite his alleged knowledge of Doe's caste. The DFEH would later file a caste discrimination claim directly <b>contrary to Same Actor Inference</b> . As Cisco later explains, "When same allegedly	Iyer Declaration, pg. 2, ln. 3 and DFEH Complaint.



			discriminatory actor previously selected plaintiff for favorable treatment, this creates an inference of nondiscrimination" [Cisco Demurrer, pg. 7, ln. 18-19].
4	Oct-Nov 2015	Same Actor Inference	<p>John Doe and other principal engineers report directly to Mr. Iyer, and are given the joint <b>highest grade</b> in the group. Mr. Iyer generously <b>bequeaths 100% of his CEO equity</b> worth several million dollars to all his employees, <b>including</b> to John Doe. John Doe receives millions worth of equity in this process due to this decision by Mr. Iyer.</p> <p>In this period, John Doe is offered multiple leadership opportunities by Mr. Iyer showing <b>nondiscriminatory intent</b> (see: Same Actor Inference). Doe's performance or lack thereof is not known from the current public court records.</p>
5	Nov 2015 – 2016	Same Actor Inference	<p>Mr. Iyer solicits for the first Head position within the Group/startup and <b>awards it to a meritorious self-identifying Dalit candidate</b> (further referred to as <i>Meritorious Dalit</i> to distinguish him from the Dalit plaintiff, John Doe.)</p>
6	Q3 2016		<p>Mr. Iyer solicits the second Head position of Engineering and <b>also awards this Head position initially to the <i>Meritorious Dalit</i>. Meritorious Dalit</b> presumably refused this second</p>
7	Q3 – Q4 2016 (a)		<p>Iyer Declaration, pg. 2, ln. 12-13. [Also: Motion for Sanctions, pg. 10, ln. 24-28.]</p>

			Head position because Mr. Iyer eventually offers the position to Mr. Kompella (co-defendant in the CISCO case).	pg. 10, ln.24-28.]
8	Q3 – Q4 2016 (b)	Frivolous / Sanctionable / Hiding Key Evidence	John Doe <b>does not apply</b> for the open Head of Engineering position. <b>Note:</b> Later on, the CRD would <b>shockingly hide</b> this fact from the judge and claim discrimination for Doe not being awarded the Head of Engineering position.	Cisco Demurrer (filed Nov 2, 2020), ln. 26, pg. 7, "that he ever wanted it". Also ln. 15, pg. 10, "which he doesn't allege he requested or wanted".
9	Nov 2016		Mr. Kompella is offered Head of Engineering as part of a comprehensive organizational change.	DFEH Complaint [pg. 8, ln. 19-21]
10	Nov 21st 2016	Frivolous / Sanctionable / Hiding Key Evidence	John Doe files a Dalit caste discrimination complaint with CISCO HR, claiming discrimination for not being awarded the Head of Engineering position. It is important to note that this position <b>was first offered</b> to the <i>Meritorious Dalit!</i> The DFEH <b>hides</b> this fact (despite their knowledge <b>since 2018</b> [pg. 10, ln. 5]) from the judge in their June 2020 complaint.	Cisco Demurrer ['teamwide reorganization' pg.10, ln. 19]
11	Nov-Dec 2016	Frivolous / Sanctionable	John Doe files for caste-based salary discrimination for not being awarded a few thousand	Cisco Demurrer and

	/ Hiding Key Evidence	dollars of salary increment in October 2016, despite Mr. Iyer having given his entire CEO equity (which amounted to millions of dollars) to all his employees including John Doe, who <b>as a result was making several millions of dollars more than his CEO, Mr. Iyer.</b>	Iyer Declaration.
12	2016-2018 (a)	John Doe files several internal complaints with CISCO HR complaining of caste discrimination, harassment, and retaliation. After multiple reviews by independent HR personnel, these allegations were found <b>unsubstantiated</b> by Cisco Systems.	DFEH Complaint, Cisco Demurrer [pg. 3, ln. 12-15], and Cisco Caste Blog para. 5.
13	2016-2018 (b)	Mr. Iyer continues to champion <i>Meritorious Dalit</i> for his career growth, in addition to having awarded him Head leadership positions in the past. Between the Q4 of 2017 and Q1 of 2018, Mr. Iyer also <b>offers his title of the overall Head (CEO) to the <i>Meritorious Dalit</i>.</b>	Iyer Declaration, pg. 2, ln. 14.
14	Q4 2017 – Q1 2018	Defendant Iyer “recruited, mentored, and promoted meritorious personnel who self-identified as Dalit, including within the current group at Cisco.” [Opposition to DFEH’s Motion to Proceed Using a Fictitious Name, pg. 4, ln. 12-13]. Also, LinkedIn records and Mr. Iyer’s declaration [pg. 2, ln. 9-14] show that Iyer <b>promoted this <i>Meritorious Dalit</i> to a</b>	Mr. Iyer and Mr. Kompella’s Opposition to Plaintiff California DFEH’s Motion to Proceed Using a Fictitious Name, filed 1/12/2021, ln. 12-13, pg. 4.

		senior management position after <i>Meritorious Dalit</i> does not accept the title of the overall Head of the group (CEO).		
15	Q1 – Q2 2018	Mr. Iyer transitions out of the group after the internal start-up is absorbed by CISCO, and also to <b>distance himself</b> from Doe. Mr. Kompella takes over as the interim Head of the group.	DFEH Complaint, Cisco Demurrer, and Iyer Declaration (pg. 2, ln. 23- 24.)	
16	Q1-Q2 2018	Mr. Iyer has not <b>promoted</b> anyone other than <i>Meritorious Dalit</i> to a senior management position in his entire tenure at Cisco (since even Mr. Kompella, the alleged 'Brahmin' co- defendant, and the interim Head of the group, is only promoted a full year later in 2019, <b>after</b> Iyer left the group.)	Mr. Kompella's Linkedin.	
17	Q2 2018	Frivolous / Sanctionable / Racism	Mr. Kompella asks John Doe for weekly status reports on request from his manager Tom Edsall. Two years later the DFEH sues Kompella (not Edsall, a white American) for <b>caste-based harassment</b> [pg. 13, ln. 7]. And despite Doe <b>not having filed</b> [ <a href="#">Kompella Declaration</a> , pg. 2 ln. 2-11.] any internal complaint alleging caste-based harassment on this matter.	DFEH Complaint and Mr. Kompella's Declaration [pg. 2 ln. 2-11.]
18	May 2018	Mr. Gupta is appointed as the new overall Head of the group.	DFEH Complaint, pg. 11, ln. 4-5.	



			Mr. Gupta rates John Doe as deficient in 6 out of 8 criteria and does not award him the position of Director of Research Operations.	DFEH Complaint, pg. 11, ln. 6-12.
19	Q3 2018		On not being awarded the position of Director of Research Operations, John Doe claims this as retaliation by Mr. Iyer and files a complaint to Cisco HR. The DFEH would later support this <b>purely conclusory</b> [pg. 14, ln. 3-7] retaliation claim, despite Mr. Iyer having already transitioned out of the group 6 months ago.	DFEH Complaint, pg. 11, ln. 2-7.
20	Jul 2018 (a)		John Doe files an administrative complaint with DFEH, a governmental body.	DFEH Complaint, pg. 5, ln. 9-17.
21	Jul 2018 (b)		Doe files a revised administrative complaint with DFEH in October 2018 naming defendants Mr. Iyer and Mr. Kompella	DFEH Complaint, pg. 5, ln. 9-17.
22	Oct 2018		DFEH becomes aware of all the facts through its 2-year long investigation and mediation. The DFEH's knowledge of uncontradicted facts since 2018 is also re-confirmed by the defendants in their <a href="#">Motion for Sanctions</a> [pg. 10, ln. 5].	DFEH Complaint, pg. 5.
23	2018- 2020		DFEH files the lawsuit alleging Dalit caste discrimination in a group <b>hiding</b> the uncontradicted fact [ <a href="#">Motion for Sanctions</a> , pg. 10, ln. 5] that <b>all three Head positions</b> were first offered to	DFEH Complaint, pg. 5.
24	June 30th 2020 (a) [Refiled: Oct 16th 2020]	Frivolous / Sanctionable / Hiding Key Evidence	DFEH files the lawsuit alleging Dalit caste discrimination in a group <b>hiding</b> the uncontradicted fact [ <a href="#">Motion for Sanctions</a> , pg. 10, ln. 5] that <b>all three Head positions</b> were first offered to	DFEH Complaint. [Also: <a href="#">Motion for Sanctions</a> , pg. 10, ln. 26-28.] 

			another <i>Meritorious Dalit!</i> The DFEH later refiles the case in State court in October 2020.	
			DFEH alleges that, ‘except for Doe, the entire team are also from the high castes in India’. Court records will later [ <a href="#">Motion for Sanctions</a> , pg.10, ln. 5] show these claims of Doe being a (1) a ‘lone Dalit’ who worked in a group consisting of, (2) ‘entirely Indians’, of, (3) ‘all upper castes’ were <b>deliberately fabricated</b> despite knowledge to the <b>contrary</b> by the CRD since 2018.	DFEH <a href="#">Complaint</a> [pg. 3, ln.1-3] and <a href="#">Motion for Sanctions</a>
25	June 30th, 2020 (b) [Refiled: Oct 16th 2020]	Fabrications	DFEH also alleges salary discrimination by Iyer, for Doe not getting a few thousand dollars in salary increment in Oct 2016, despite Iyer having awarded Doe several million dollars in stock grants, and having sacrificed 100% of his CEO equity to his employees, including to Doe. These are the DFEH’s <b>tax-payer-funded ethics.</b>	DFEH <a href="#">Complaint</a> , ln. 9, pg. 3 and ln. 6, pg. 10.
26	June 30th, 2020 (c) [Refiled: Oct 16th 2020]	Unethical	The DFEH in their complaint defines caste, as a “strict HINDU social and religious hierarchy”. The DFEH in their complaint assigns Mr. Iyer a Hindu caste. This is <b>malicious</b> as the DFEH knew since 2018 as “these uncontradicted facts were provided to Plaintiff during the investigation of Doe’s	DFEH <a href="#">Complaint</a> , <a href="#">Iyer’s Stanford Webpage</a> , <a href="#">Iyer Declaration</a> . [Also: <a href="#">Motion for Sanctions</a> , pg. 10, ln.4-5.]
27	June 30th, 2020 (d) [Refiled: Oct 16th, 2020]	Constitutional Violation of First Amendment		



			administrative complaint" [pg. 10, ln. 5-6]. They would also have known from <a href="#">public data</a> , that Mr. Iyer is publicly irreligious for decades, <b>violating</b> an American citizen's right to freedom of religion under the 1st Amendment.	
28	June 30th 2020 (e)	Spurious Claim	The DFEH in a <b>press-hungry</b> move immediately publicizes their lawsuit, while also claiming from the Equality Labs (self-acknowledged, unscientific) survey that "67% of Dalits reported being treated unfairly at their American workspaces". Judge Drew Takaichi would later <b>discard</b> [See Timeline: Feb 11, 2021] this spurious survey.	DFEH press release.
29	June 30th 2020 (f)	Tampering with Dates	DFEH <b>misleads</b> the court and claims without attaching any proof that they served the legal charges (Service of Process) to Mr. Iyer and Mr. Kompella in October 2018 meeting the legally stipulated December 2018 deadline.	DFEH Complaint, pg. 5, ln. 21-22.
30	June 30th 2020 (g)	Fabrication	The DFEH claims that the defendant Kompella, 'with the new title of Head of Engineering, received a raise of approximately 15%. But court records show, that this title <b>did not</b> 'come with any additional benefits or compensation'.	Mr. Kompella's Declaration [pg. 1, ln. 21-23]



				Cisco Demurrer pg. 1, ln 6-7, and pg. 6, ln. 12.
31	October 16th, 2020 (a)	DFEH voluntarily dismisses their federal court complaint, and refiles in state court for tactical reasons, to <b>avoid arbitration</b> .		
32	October 16th, 2020 (b)	Racial Profiling  DFEH files a motion to anonymize Doe making claims that, "Dalit Indians in the United States, once their caste is revealed, have been <b>raped</b> , <b>attacked</b> , and <b>spat on</b> because of their caste" [pg. 6, ln. 16-18]. The DFEH would later <b>repeat</b> these rape allegations in their Writ Petition in the <u>Appeals Court</u> in March 2021.	Motion to Proceed Using a Fictitious Name	
33	Oct 27th, 2020	Contradiction  DFEH claims that Doe's caste status is <b>private</b> and submits Doe's declaration, "I do not share my caste with others, even my close friends." [ <a href="#">Doe Declaration</a> , pg.2, ln.2]. However, Doe then <b>contradicts himself and the DFEH twice</b> in his own declaration. (1) He states, Iyer was aware of his caste because they attended [the Indian Institute of Technology] at the same time." [ <a href="#">Doe Declaration</a> , pg. 2, ln. 26] (2) He also states "a lot of my classmates [in school] knew about my caste ..." [ <a href="#">Doe Declaration</a> , pg. 2, ln. 3-4.]	John Doe Declaration.	
34	Nov 2nd, 2020 (a)	Contradiction  DFEH also submits Mr. Yengde's <a href="#">declaration</a> [pg.3, ln. 25] which <b>contradicts</b> the caste privacy claim by the DFEH by stating that caste can be inferred from	Yengde Declaration.	

one's last name and other public markers.

35	Nov 2nd, 2020 (b)	Speculation	DFEH alleges a risk of retaliatory physical or mental harm to Doe via Doe's declaration, "I am deeply concerned that Cisco, Iyer, and Kompella <b>will publicly disclose</b> my identity to people in our professional and social community" [ <a href="#">Doe Declaration</a> , pg. 3, ln. 6], and also claims a <b>possibility</b> of such harm via his shared social network with Mr. Iyer [ <a href="#">Doe Declaration</a> , pg. 3, ln. 7-9]. Judge Takaichi would later rule that as speculation [pg. 4, ln. 25] not <b>evidence</b> .	<a href="#">John Doe Declaration.</a>
36	Nov 2nd, 2020 (c)	Unscientific Evidence	Equality Labs (a group founded by <a href="#">openly Hinduphobic</a> activist Thenmozhi Soundararajan) formally attempts to add their <b>self-acknowledged, unscientific, web survey on caste</b> into the record. By Equality Lab's own admission, "it is <b>unclear</b> whether the Caste distribution in our survey reflects the actual distribution of Caste groups of South Asians in the diaspora, or that some groups disproportionately participated."	<a href="#">Thenmozhi Soundararajan Declaration and Equality Labs Survey</a> , Nov 2nd, 2020 [pdf pg. 24, ln.3; pdf pg. 23, ln.9].



			Equality Lab plainly states that there is “ <b>no existing data</b> . . . to correlate [the report’s] findings.” [Opposition to DFEH’s Motion to Proceed Using a Fictitious Name, pg. 4, ln. 25]	
37	Nov 2nd, 2020 (d)	Irrelevant Evidence	The DFEH even requests the judge to take <b>judicial notice</b> of this unscientific survey! They also request notice of press articles, many of which are irrelevant to the case or simply repeat the allegations in the Cisco case ... driven by the plaintiff's own media outreach.	DFEH Request for Judicial Notice, filed Nov 2nd 2020.
38	Nov 2nd 2020 (e)	Racial Profiling	The DFEH repeatedly smears Hindu Americans, and quotes from the unscientific survey, unbelievable statistics ( <b>contradicted</b> by the absence of any police records) that, “found that in America, 1 in 4 Dalits surveyed experienced <b>physical assault</b> ”. Equality Labs <b>doubles down</b> on this claim quoting “26% of Dalits who responded said that they had faced physical assault in the United States based on their caste”.	Equality Labs Survey [pdf pg. 34, ln. 1-3; also pdf pg. 28].
39	Nov 2nd 2020 (f)	Xenophobia	The DFEH attorney, Siri Thanasombat, <b>smears</b> all Indian managers, by filing as “ <b>evidence</b> ” a statement by 30 women in Silicon Valley, claiming to be Dalit, who <i>anonymously</i> accuse their Indian managers of <i>unspecified</i> casteism, <i>without naming</i> any specific incident, <i>without naming</i> their alleged	Dalit Women Statement, incorporated in Siri Thanasombat Declaration, pg. 21, Nov 2nd 2020. Also available in The A

			casteist managers or co-workers, <i>without giving any specifics of any casteist comments directed on them, without location, date, time or any details or any collaborating witnesses while concluding that “working with Indian managers is a living hell”. Note:</i> Judge Takaichi would later (see Timeline, Feb 11th 2021) rule this as not evidence.	Washington Post.
40	Nov 2nd 2020 (g)	Xenophobia	CRD needlessly politicizes and <b>attacks</b> Indian Prime Minister Modi by claiming “an increase in male chauvinism after the election of Indian prime minister, Modi” ( <b>ironically</b> known to be from a “lower caste”, and who enjoys widespread support from all “castes” in India). <b>Note:</b> Judge Takaichi would later (see Timeline, Feb 11th 2021) rule this as not evidence.	Dalit Women Statement, incorporated in Siri Thanasombat Declaration, pg. 22, Nov 2nd, 2020. Also available in The Washington Post.
41	Nov 2nd, 2020 (h)	Tampering with Dates	Cisco <b>contradicts</b> the DFEH’s <b>deceptive claim (feigning to the judge)</b> of timely service of process by stating, “Moreover, Iyer and Kompella were not served with the charge on October 9, 2018. Instead, they were not served with the charge until late March 2019”. In the interim 2 years, the DFEH has not produced <b>any evidence</b> to the contrary.	Cisco Demurrer, pg. 4, footnote 4.
42	Nov 2nd, 2020 (i)	Tampering with Dates	DFEH claims that Doe complained and hence Mr. Iyer retaliated and denied Doe a	Cisco Demurrer, pg. 14, ln. 8-9. 

			salary raise. Cisco <b>counters</b> this <b>deceptive</b> cause-and-effect claim, by stating, “that the only alleged denial of a raise occurred in October 2016, <b>before</b> Doe ever complained. Cisco <b>could not have</b> retaliated against Doe for complaints he had not yet made.”	
43	Nov 2nd, 2020 (j)	Contradiction	DFEH's makes an <b>self-contradictory, manipulative</b> claim that Doe (while being compensated in <b>millions</b> ) was denied a few thousands of dollars raise due to his 'lower-caste', despite stating that 4 of 8 employees (all of whom they forcibly call upper-caste) simultaneously did not receive a raise. Thus by their own admission, there were more upper-caste employees who did not receive a raise!	Cisco Demurrer, pg. 7, ln. 21-22.
44	Nov 2nd, 2020 (k)	Inconsistency	Doe makes a vague reference to Iyer making a discriminatory comment about a Muslim candidate. However, public records show that Iyer recruited a senior Muslim co-founding engineer on his team. Iyer also appears to have recruited this Muslim candidate in his previous start-up and even previously at Cisco Systems. Public records show Iyer also recruited two other senior Muslim candidates into the same team.	DFEH Complaint, pg. 9, ln. 4.



			Cisco challenges DFEH's caste discrimination allegations stating "Iyer actively recruited and hired Doe to work with him in a highly coveted position at Cisco earning top compensation, even by Silicon Valley standards. (When <b>same allegedly discriminatory actor</b> previously selected plaintiff for favorable treatment, this creates "an inference of nondiscrimination").	Cisco Demurrer, pg. 7, ln. 15.
45	Nov 3rd, 2020 (a)	Same Actor Inference	Cisco mentions, "As Doe acknowledges, Cisco, which does not tolerate discrimination of any sort, investigated Doe's contention. Doe further acknowledges that, at Doe's request, Cisco conducted a <b>second level [independent]</b> review of the investigation's findings". Thus Doe's self-acknowledgment is <b>inconsistent</b> with DFEH's claim that Cisco ignored Doe's complaints and failed to recognize <b>casteism</b> [pg. 10, ln. 13-15].	Cisco Demurrer, pg. 1 ln. 16-18 Also, see Cisco Caste Blog
46	Nov 3rd, 2020 (b)	Inconsistency	Cisco counters that the CRD [despite 5 years since Doe was employed] makes <b>conclusory claims</b> [pg. 9, ln. 24; pg. 13, ln. 24], where no specific actions are pled [pg. 9, ln. 25], while "vaguely referencing,	Cisco Demurrer.



			unspecified discriminatory comments".	
48	Nov 3rd, 2020 (d)	Inconsistency	<p>Cisco's Demurrer [pg. 10, ln.16] mentions that DFEH "cannot point to <b>ANY</b> event where his [Doe] caste was mentioned or referenced, [other than the truthful acknowledgement of Doe's IIT rank]". Defendant Iyer also mentions that his several generous actions towards Doe do not align with Doe's allegations, and specifically about Iyer making <b>ANY</b> statement about Doe being from a scheduled caste.</p>	Mr. Iyer and Mr. Kompella's Opposition to Plaintiff California DFEH's Motion to Proceed Using a Fictitious Name, pg. 2 ln. 3-12.
49	Nov 3rd, 2020 (e)	Unethical	<p>CISCO releases a blog giving a clean chit to Mr. Iyer and Mr. Kompella, and also expresses dismay at the <b>highly unusual</b> tactic of naming the managers, "who would face abuse on social media with no chance to be heard or defend themselves."</p> <p>Further, Cisco mentions that DFEH and Doe have insisted on keeping Doe's identity confidential, a courtesy neither he nor the DFEH extended to the defendants. This bullying tactic by the DFEH is all the more <b>unethical</b> given the now public facts of this case.</p>	Cisco Caste Blog.
50	Nov 3rd, 2020 (f)	Xenophobia / Irrelevant Evidence	<p>Cisco <b>defends</b> its Indian employees, and files a motion to strike CRD's immaterial broad-</p>	"Memorandum Of Points And Authorities In 

			based <b>allegations attacking Indians</b> , including (1) The “ethnic composition of Cisco’s workforce” and the alleged <b>“over-representation of Indians”</b> at Cisco, (2) The usage of H1-B visas, and (3) alleged Caste Discrimination By “Non-Parties Against Non-Parties” in India based on “hearsay and absence of evidentiary support” as <b>irrelevant</b> to this case.	Support Of Motion To Strike Portions Of Plaintiff’s complaint” by Cisco Systems, pg.10-11.
51	Q4 2020	Evasion / Hiding Key Evidence	Cisco requests judicial notice, but the DFEH <b>refuses</b> to share a copy of John Doe’s original administrative complaint filed in 2018. What is the DFEH <b>hiding from the court and the public?</b>	Cisco Demurrer, pg. 4, footnote 4, 5.
52	Jan 7th 2021	Constitutional Violation of First Amendment	Since, the DFEH defines caste, as a “strict HINDU social and religious hierarchy”, the Hindu American Foundation (HAF) files for injunctive relief to prevent the state’s <b>overreach and violation</b> of Hindu American rights under the First and Fourteenth Amendments and California’s Unruh Civil Rights Act. The HAF stays <b>neutral</b> to the allegations in the case itself.	HAF Motion to Intervene & HAF Website, DFEH Complaint, pg. 2, ln. 6
53	Jan 12th 2021 (a)	Unsupported, Conclusory	Cisco <b>insinuates wrongdoing</b> by the DFEH, via their actions, which are, “based on <b>unsupported, conclusory</b> allegations that DFEH well knows from its investigation cannot be sustained”.	Cisco Opposition to Fictitious Name, pg. 4, ln. 2-3.



			The DFEH <b>perpetuates</b> "caste-based stereotypes forcing a caste system [on individual defendants] based on birth, not beliefs". This also <b>violates</b> the First Amendment.	Iyer Kompella Opposition, pg. 12, ln. 13.
54	Jan 12th 2021 (b)	Constitutional Violation of First Amendment	Judge Drew Takaichi, <b>denies</b> the CDFEH's motion to put into judicial notice their 23+ documents which consist of <b>irrelevant evidence</b> — several media articles and opinion pieces (many with <b>circular</b> references back to the Cisco case), a US Dept. of State report, etc., and also <b>denies</b> judicial notice of the unscientific Equality Labs survey.	Re: Motion to Proceed Using Fictitious Name, filed Feb 11th, 2021, pg. 4 ln. 5-11.
55	Feb 11th, 2021	Irrelevant Evidence	Judge Drew Takaichi, <b>denies</b> the CDFEH's motion to proceed with a fictitious name, calling out the CDFEH's motion as <b>specious</b> , and the evidence submitted by Doe for retaliatory physical harm as <b>speculation</b> . The DFEH appeals this verdict and files a Writ petition.	Re: Motion to Proceed Using Fictitious Name, filed Feb 11th 2021, pg. 6 ln.11.
56	Feb-Mar 2021	Specious	In contrast to the HAF's neutrality on the specifics of the case, The Ambedkar International Center, files an <b>Amicus Curiae, personally</b>	Application to file Amicus Curiae pg. 5 footnote 22
57	Feb 22nd, 2021	Defamation / Irony		

			attacking defendant Iyer by speculating, “Higher—caste workers sometimes view lower—caste workers such as John Doe who benefit from affirmative action programs as incompetent and undeserving … That attitude is evident in the case before the court: John Doe’s Cisco supervisor told colleagues that Doe was “not on the main list” at one of India’s universities.” This <b>while fully aware</b> (as they quoted declarations of the defendants) that Iyer gave all his top <u>three</u> Head positions first, to a Meritorious Dalit.	Also, see screenshot.
58	Feb 24th 2021	Tampering with Dates	The DFEH <b>misleads</b> the court by accusing Cisco of refusing to ‘meet and concur’ [DFEH Opposition, pg. 3, sec. 4(A)] to dismiss Cisco’s demurrer. But emails between Cisco and the DFEH (J. Liburt Declaration, Pg 1-3, referencing Exhibit D, E filed Nov 3rd, 2022) show that the DFEH <b>themselves</b> moved or canceled meetings with Cisco thrice on separate independent instances before Nov 2nd 2020, <b>exposing the DFEH’s deceitful claims.</b>	DFEH Opposition to Demurrer, filed Feb 24th, 2021, pg. 3.
59	March 2021	Racial Profiling	The DFEH repeats their previous smears of Hindu Americans quoting again, “that in America, 1 in 4 Dalits surveyed experienced physical assault” in their Writ Petition to the Court of Appeal, Sixth Appellate District.	Petitioner’s reply iso Writ [pg.17.] also see Screenshot.



			The DFEH's Writ petition to contest their request for anonymity (quoting Doe's declaration) states that defendant Iyer spoke about Doe's caste to Doe's 'shared social circles' [DFEH Writ Petition, pg. 38]. But this <b>deceptive narrative built upon treating allegations as facts</b> are <b>contradicted by Doe's own declaration</b> (pg. 3, para. 13, filed Nov 2nd, 2020) which merely <b>speculates</b> about his shared circles (as also pointed out in the trial court judge's ruling on Feb 11th, 2021).	DFEH Writ Petition, filed Mar 30th, 2021, 6th Court of Appeals, pg. 38.
60	Mar 30th 2021 (a)	Deception	The DFEH ascribes collective guilt and <b>generalizes</b> their previous claim that "Dalit Indians in the United States, once their caste is revealed, have been raped, attacked, and spat on because of their caste" [DFEH Petition for Writ of Mandate, pg. 38, footnote 11], this time offering a single unconfirmed, uncorroborated [news article] with an anonymous accuser as proof!	The US isn't safe from the trauma of caste bias
61	Mar 30th 2021 (b)	Racial Profiling	CRD prosecutors, Janette Wipper and Melanie Proctor <b>racially divide Hindus</b> by quoting <b>without any evidence</b> the Equality Labs report "Dominant caste people [in U.S. tech networks and the Indian Bay Area community] openly boast about their caste privilege	Pg. 21, para 2, Petitioners Reply to Writ Filed on April 23rd, 2021, California Court of Appeal 6th Appellate

			and supposed biological superiority." The CRD repeats this propaganda (reminiscent of similar propaganda against the Jews in Nazi Germany).	District Case H048962.
63	April 23rd 2021 (b)	Unethical	The CRD in requesting anonymity for Doe goes to great lengths to state that " <i>Caste is a matter of highly sensitive and personal nature</i> ". This reveals the CRD's unethical nature and <b>double standards</b> as the CRD openly revealed the individual defendants' names and their alleged or perceived castes.	Pg 19, para 2, Petitioners <a href="#">Reply iso Writ</a> Filed on April 23rd, 2021, California Court of Appeal 6th Appellate District Case H048962.
64	May 12th 2021	Unethical	DFEH Director Kevin Kish encourages a change.org petitioner, Aditi Ramaswamy to lobby California senators on caste, using the as-yet sub-judice <a href="#">Cisco case as a basis</a> for Dalit discrimination, while <b>unethically</b> not being honest to her, that <b>all</b> Head positions, in this group, went to a Dalit.	<a href="#">Update to Aditi Ramaswamny's Petition.</a> <a href="#">Also, see screenshot.</a>
65	Oct 2021	Conflict of Interest	The EEOC (a federal government organization) alleges serious <b>ethical violations</b> by the DFEH in October 2021, including a <b>repeated violation</b> of the California rules of professional conduct, and by failing to isolate	California DFEH accused of ethics violations in Activision Blizzard lawsuit.

			DFEH attorneys who had a <b>conflict of interest.</b>	
66	Q4 2021- Q1 2022	Contempt of Court	In 2022, the EEOC alleges other serious <b>prosecutorial misconduct and behavior</b> <b>contemptuous of court</b> by the DFEH. The company Activision also joins the EEOC and seeks an ethics review against the DFEH. Later, the judge would deny the DFEH from intervening in the case, but the DFEH in <b>contempt of court</b> would attempt to intervene multiple times <b>despite</b> the court ruling. The YouTube channel by the <a href="#">Hoeg Law firm</a> has several detailed videos on the public charges against the DFEH.	EEOC  <b>FALLOUT:</b> Activision  Seeks Ethics Review of ENTIRE CA Lawsuit, Also: California, Central District Court, Case No. 2:21-CV- 07682-DEF- JEM.
67	April 2022		In April 2022, per reports, the California Governor <b>fired</b> the DFEH lead attorney <a href="#">Janette Wipper</a> (also the lead attorney in the Cisco caste case). The co- lead prosecutor Melanie Proctor in the Cisco caste case has <b>also</b> <b>'resigned'</b> as of April 2022.	DFEH Lawyers  Gone   Gov Accused of "Interference".
68	Q1-Q2 2022	Constitutional Violation of Due Process	Tesla releases a blog complaining about the DFEH's class action racial discrimination lawsuit, despite <b>no finding of cause</b> by the DFEH in over 50 complaints, and also files an official complaint with the OIG.	The DFEH's misguided suit.



			CRD's attorney Michelle Lee urges the Appeals Court to twice reconsider and add the Equality Labs survey (which includes the claim that 1 in 4 Dalits have been physically assaulted or raped by Upper Caste Hindus in the United States), and later again take into consideration Thenmozhi Soundarajan's Declaration on her EQ Labs Survey.	Oral Arguments, Sixth District Court of Appeal (Timestamp: 1:52:50, and 2:23:25)
69	May 10th, 2022	Racial Profiling	Michelle Lee also says that there is nothing in the records except for the defendant saying that they do not discriminate. In light of the Motion for Sanctions, this statement is grossly deceptive.	Oral Arguments, Sixth District Court of Appeal
70	May 10th, 2022	Deception	An investigative journalist, Matt Taibbi (now famous for The Twitter Files governments expose), releases a multipart article detailing the historical background of <b>unethical prosecutorial behavior</b> from 2013 onwards, including Janette Wipper's (the now fired chief DFEH prosecutor of the Cisco caste case) actions in the Oracle, Google lawsuits.	"The Lawyers Who Ate California", Part 1, Part 2, Part 3.
71	May 14th, 2022	Unethical	Will Swaim, from the California Policy Center, suggests that the CRD "has gone rogue and the [California] Governor [Gavin	California's anti-business campaign is evident in the
72	May 2022	Unethical		

			Newsome] is trying to rein it in." He also calls the DFEH a <b>tyrant</b> , and details the history, and background of the multiple serious issues within the DFEH covering the DFEH's behavior with Activision, Tesla, and Riot games.	war against Activision – Orange County Register.
73	Nov 2020 – Q3 2022	Racial Profiling	The DFEH <b>smears</b> the entire Indian American community for a <b>sixth consecutive time</b> (since their anonymity motion in Nov 2020) in the <u>appeals court</u> on May 10th, 2022 that 'upper-caste' Indian Americans have physically assaulted or raped 1 in 4 American Dalits in the United States just on knowledge of their Dalit caste. This allegation without <b>any evidence</b> in police records statistically tarnishes the reputations of <b>Indian Americans</b> .	California Court of Appeal, Case H048962.
74	Jun 2021 – Q3 2022	Defamation	The DFEH <b>conveniently ignores</b> the now available scientific Pew research caste survey (June 29th, 2021) or the Carnegie Endowment Indian American survey (June 9th, 2021) for their caste data, but continues to <b>defame</b> Hindu Americans quoting from the unscientific <a href="#">Equality Labs survey</a> .	Attitudes about caste, Pew Research. Social Realities of Indian Americans, Carnegie Endowment Survey.
75	Aug 5th 2022		The <u>appeals court</u> denies Cisco's motion to compel arbitration. It asks judge Takaichi from the trial court, to review the evidence for the DFEH's anonymity motion for Doe, and	California Court of Appeal, Case H048962.



			take into consideration evidence <b>(if any)</b> that Doe may have submitted of any specific threat of bodily harm to his family members in India.	
76	Sep 2022		The DFEH changes its name to the Civil Rights Department (CRD). It remains to be seen whether the new name would cause any change in their <b>denigration</b> of Hindu Americans (amongst others) going forward.	California Civil Rights Department.
77	Sep 22nd 2022 (a)	Constitutional Violation of First Amendment	The Hindu American Foundation (HAF) sues Kevin Kish, the director of the California Civil Rights Department (CRD) ironically for the CRD's violations of Hindu-American Civil Rights encompassing violations of <b>Free Exercise of Religion, Denial of Procedural Due Process and Denial of Equal Protection.</b>	HAF's Federal lawsuit in the US Eastern District Court of California.
78	Sep 22nd 2022 (b)	Constitutional Violation of Due Process	TESLA independently also counter sues the California Civil Rights Department (CRD) ironically for the CRD's violations of TESLA's <b>Due Process Civil Rights</b> , which includes the same lawyers as in the Cisco case. TESLA's allegations that the CRD did not interview TESLA management have <b>similarities</b> with the CRD's meager 15-minute interview with Mr. Kompella before filing suit against him in the Cisco case.	TESLA's counter lawsuit in the Superior Court of The State of California, Alameda County.
79	Oct 19th 2022	Constitutional Violations	Two professors file under Section 1983 a Civil Rights	US District Court (Central)

			lawsuit against the Chancellor Jolene Koester, and Trustees of the California State University (CSU) for targeting Hindus by adding 'caste' in their interim policy, citing constitutional violations of the <b>First Amendment, Equal Protection</b> (referencing California's definition of caste in the Cisco case). They also cite a <b>Due Process 'Void for Vagueness'</b> violation due to the unconstitutionally vague definition of caste and raise serious concerns about the " <b>stereotypes and implicit bias</b> " that the CSU Policy perpetuates.	District Court of California) Kumar, Sinha vs. California State University.
80	Dec 30th, 2022 (a)	Evasion	CRD appears to be <b>burying their egregious behavior</b> in this case from public scrutiny by approaching Cisco for confidential mediation (which Cisco has accepted), contrary to CRD's past efforts to hastily publicize the case in the <a href="#">press</a> , lobbying <a href="#">senators</a> , and in their <a href="#">repeated opposition</a> to arbitration.	Case Management Statement [Pg. 4, Sec. 16c] filed by Cisco systems on 30th December, 2022.
81	Dec 30th, 2022 (b)		It appears that "CRD has agreed to <b>voluntarily dismiss</b> individual Defendants pending approval of the Director of the CRD (Kevin Kish)." This <b>concession</b> by the CRD is indicative of and <b>exposes</b> the past egregious behavior of CRD prosecutors Janette Wipper, Melanie Proctor, and Siri Thanasombat in this case. Defendants threaten to file	Case Management Statement [Pg. 5, Sec. 18] filed by Iyer, Kompella on 30th December 2022.



			a Motion for Sanctions if the CRD does not voluntarily dismiss the case against them.	
82	Jan 11th, 2023 (a)	Frivolous / Sanctionable	Defendants file a <a href="#">Motion to Sanction</a> the CRD, for "filing a legally <b>frivolous</b> complaint [pg.11, ln. 14-15]", despite "overwhelming <b>evidence</b> presented by Defendants <b>directly contradicting</b> Plaintiff's spurious accusations [pg.11, ln.2-3]."	<a href="#">Motion for Sanctions</a> , filed Jan 11th, 2023.
83	Jan 11th, 2023 (b)	Fabrications	Defendants allege an <b>improper purpose</b> (to harass or to cause unnecessary delay or expense) by the CRD. They present several <b>uncontradicted facts</b> [ <a href="#">Motion for Sanctions</a> , pg.10, ln. 5] that were known to the CRD since 2018 including disproving fabricated claims of Doe being a 'lone Dalit', the group consisting of 'entirely Indians', and 'all upper castes'.	<a href="#">Motion for Sanctions</a> .
84	Jan 11th, 2023 (c)	Fabrications Casteism	Defendants state that the CRD <b>did not even bother</b> to interview the Dalit Head in the group (talk about <b>casteism!</b> ). This further counters the CRD's <b>fabrications</b> of allegations 'of a caste hierarchy' and a 'hostile to Dalit environment' [ <a href="#">Motion for Sanctions</a> pg.10, ln. 24-25] since all Head positions were already offered or accepted by a different Dalit. Besides, Doe was given the joint highest grade, awarded millions of dollars in equity, and	<a href="#">Motion for Sanctions</a> , Iyer Declaration.



			offered multiple leadership positions [ <a href="#">Iyer Declaration</a> , Pg. 2, line 20-21] by Mr. Iyer.	
85	April 10th, 2023	Withdrawal Dismissal	On being threatened by sanctions by the defendants for fabrication of evidence, the CRD <b>withdraws</b> their complaint against both defendants, Iyer and Kompella. Contrary to their past actions to keep this in the Court, the CRD approaches CISCO, yet again, for mediation (to keep their fabrications of public scrutiny).	<a href="#">Dismissal filed</a> by the CRD.
86	April 12, 2023		The California Policy Center releases a report stating that Bounty Hunter incentives has made the California's Civil Rights Department (CRD), fund its budget through attorney fees and has created a monster	<a href="#">Press Release</a> by Foxrothschild for Dismissal of claims  <a href="#">Enforcing Civil Rights: Does a Regulator's Profit Motive Benefit the Public Interest?</a> by Steve McCarthy

